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EXHIBIT A

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DISNEY ENTERPRISES, INC.,

Plaintiff,

vs.

RED EARTH GROUP LIMITED, d/b/a
SATÉUR,

Defendant.

Case No. 2:25-cv-06469-DSF-BFM

**[PROPOSED] FINAL JUDGMENT
AND PERMANENT INJUNCTION**

[PROPOSED] FINAL JUDGMENT AND PERMANENT INJUNCTION

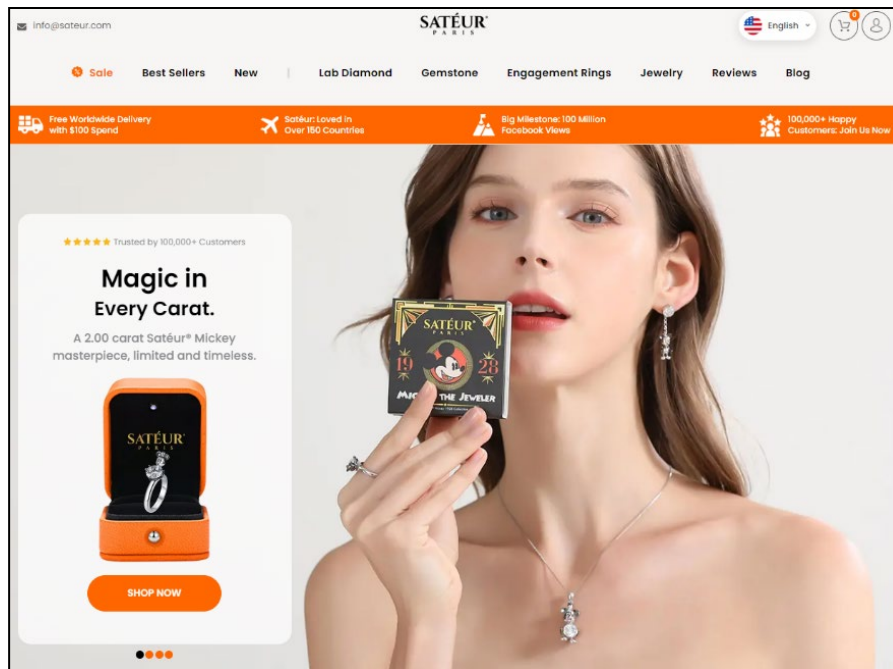
Plaintiff Disney Enterprises, Inc. (“Disney”) brought this action on July 16, 2025, alleging trademark infringement and false designation of origin by Defendant Red Earth Group Limited d/b/a Sat  r (“Red Earth Group”). Disney and Red Earth Group have stipulated to the entry of this Final Judgment and Permanent Injunction. Having considered the parties’ stipulation and the record before this Court, this Court makes the following findings of fact and conclusions of law:

1. This Court has jurisdiction over Disney, Red Earth Group, the subject matter of this litigation, and the above-captioned action. Red Earth Group consents to the continuing jurisdiction of this Court for purposes of enforcement of this Final Judgment and Permanent Injunction. Red Earth Group further irrevocably and fully waives and relinquishes any argument that venue or jurisdiction by this Court is improper or inconvenient.

2. Disney is the exclusive owner of the distinctive trademarks identified in the federal trademark registrations attached hereto as **Exhibit A**, as well as common-law trademark rights in the MICKEY and MICKEY MOUSE word marks (in both standard and stylized forms), the three-circle mouse ear device mark, and the Mickey Mouse character design marks (collectively, the “Mickey Mouse Trademarks”). Disney’s rights in the Mickey Mouse Trademarks are valid, subsisting, and enforceable, and Disney (including through its affiliates and licensees) has used the Mickey Mouse Trademarks in commerce for many years in connection with a variety of products and services, including jewelry.

3. Disney has used the Mickey Mouse Trademarks as source identifiers for many years; the Mickey Mouse Trademarks are widely recognized by consumers as designating products and services authorized by Disney; and such longstanding and exclusive use has generated substantial goodwill and strong association with Disney and its products and services.

4. Disney brought this action against Red Earth Group alleging trademark infringement and false designation of origin. Disney’s action arose out of Red Earth Group’s unauthorized use of the Mickey Mouse Trademarks through the manufacture, marketing, sale, offering for sale, and distribution of products that reproduce, depict, copy, or incorporate Disney’s Mickey Mouse Trademarks. Such products include jewelry marketed and sold under the “Satéur® Mickey 1928 Collection” and the “Satéur® 1928 Mickey Voyager Collection.” Red Earth Group marketed, advertised, and offered these products through its website, Sateur.com, as well as through associated online marketing channels and social-media platforms. The products were sold in packaging that prominently displayed unauthorized Mickey Mouse images and designs, including but not limited to full-body depictions of Mickey Mouse, Disney’s three-circle mouse ear device mark, and the MICKEY name and stylized font. Red Earth Group also used the phrases “Mickey the Jeweler” and “Magic in Every Carat,” together with Mickey Mouse imagery, as illustrated below:





5. Red Earth Group has never been authorized by Disney to use the Mickey Mouse Trademarks in any manner. Red Earth Group's unauthorized use of marks that are identical, nearly identical, or confusingly similar to Disney's Mickey Mouse Trademarks was likely to cause consumer confusion regarding source, sponsorship, or affiliation despite the purported disclaimers Red Earth Group claimed to include.

6. Disney was likely to have suffered irreparable injury from Red Earth Group's unauthorized use of marks identical, nearly identical, or confusingly similar to the Mickey Mouse Trademarks, including harm to Disney's relationships with its licensees, loss of goodwill with customers, and the risk of diversion of sales away from Disney's genuine, authorized merchandise. Disney would risk continued irreparable injury absent a permanent injunction enjoining such conduct.

7. Red Earth Group stipulates to the entry of this Final Judgment and Permanent Injunction, forever enjoining it from infringing upon Disney's intellectual property rights in the Mickey Mouse Trademarks.

8. Red Earth Group irrevocably and fully waives notice of entry of this Final Judgment and Permanent Injunction, and understands that any violation of its terms will subject Red Earth Group to all penalties provided by law, including contempt of Court.

1 Accordingly, it is ORDERED, ADJUDGED, and DECREED that Red Earth
2 Group, and all individuals who serve as Red Earth Group's officers, directors,
3 agents, servants, employees, attorneys, successors, affiliates, subsidiaries, and
4 assigns, as well as all others in active concert or participation with Red Earth Group,
5 ARE HEREBY PERMANENTLY ENJOINED AND RESTRAINED from:

- 6 a. using, displaying, reproducing, or distributing any mark, image,
7 or design that is identical to, nearly identical to, or confusingly
8 similar to the trademarks owned by Disney that depict, refer to,
9 or otherwise incorporate the Mickey Mouse Trademarks, in
10 connection with the manufacture, distribution, advertising,
11 marketing, offering for sale, and/or sale of merchandise that is
12 not Disney's genuine product or a product authorized by Disney;
- 13 b. committing any act, including making or displaying any
14 statement, representation, or depiction, that is likely to cause
15 consumers to believe that: (i) Red Earth Group's products or
16 services are approved, endorsed, licensed, sponsored, authorized,
17 or franchised by, or otherwise associated, affiliated, or connected
18 with Disney or (ii) Disney's products or services are approved,
19 endorsed, licensed, sponsored, authorized, or franchised by, or
20 otherwise associated, affiliated, or connected with Red Earth
21 Group;
- 22 c. using, or authorizing any third party to use, any false designation
23 of origin, false description, false representation, or any other
24 thing calculated or likely to cause confusion or mistake in the
25 mind of consumers, or to deceive consumers into believing that
26 Red Earth Group's products and services are in any way
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1 sponsored, licensed, or authorized by, or affiliated or connected
2 with, Disney;

- 3 d. registering or applying to register any trademark, service mark,
4 domain name, trade name, or other source identifier or symbol of
5 origin that consists of or incorporates Disney's Mickey Mouse
6 Trademarks, or any other mark that infringes upon, or is likely to
7 be confused with, Disney's Mickey Mouse Trademarks or any of
8 Disney's goods or services;
- 9 e. otherwise infringing upon the Mickey Mouse Trademarks and/or
10 damaging Disney's goodwill therein; or
- 11 f. assisting, aiding, or abetting any person or business entity in
12 engaging in or performing any act prohibited in subparagraphs
13 (a) to (e) above, or effecting any assignments or transfers,
14 forming new entities or associations, or employing any other
15 means of circumventing or otherwise avoiding the prohibitions
16 set forth in subparagraphs (a) to (e).

17 It is further ORDERED, ADJUDGED, and DECREED as follows:

- 18 a. Judgment is entered for Disney and against Red Earth Group on
19 the Claims for Relief in Disney's Complaint;
- 20 b. All claims and defenses in this action are hereby resolved by this
21 Final Judgment and Permanent Injunction;
- 22 c. The parties waive appeal of this Final Judgment and Permanent
23 Injunction;
- 24 d. The parties will bear their own costs and attorneys' fees;
- 25 e. Red Earth Group shall give notice of this Final Judgment and
26 Permanent Injunction to each of its officers, directors, agents,
27 servants, employees, assigns, partners, owners, alter egos,
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1 affiliates, all entities through which it conducts business,
2 representatives, successors, licensees, and all those acting in
3 concert or participation with each or any of them; and

4 f. The Court shall retain continuing jurisdiction of this action for
5 purposes of enforcing this Final Judgment and Permanent
6 Injunction, by way of contempt or otherwise.

7 IT IS SO ORDERED.

8 DATED:


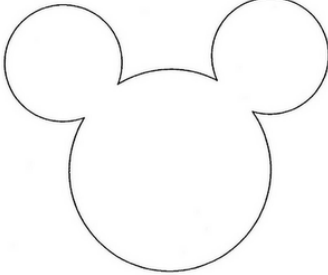

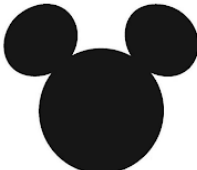
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10 By: _____
11 Honorable Dale S. Fischer
12 United States District Judge
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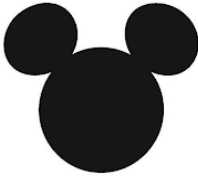

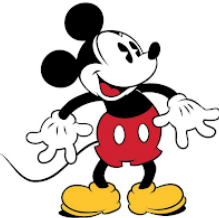


Exhibit A



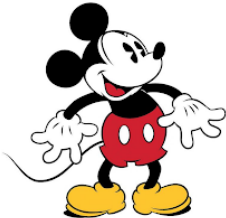


Mark	Reg. No. Reg. Date	Goods & Services
MICKEY MOUSE	Reg. No. 6257456 Reg. Date Jan. 26, 2021	INT. CL. 3 Non-medicated cosmetics; non-medicated dentifrices; non-medicated toiletry preparations; fragrances; perfumes
MICKEY MOUSE	Reg. No. 3006350 Reg. Date Oct. 11, 2005	INT. CL. 9 CD-ROM discs, computer game programs and computer software featuring learning activities, games, and entertainment
MICKEY MOUSE	Reg. No. 3588873 Reg. Date Mar. 10, 2009	INT. CL. 9 Audio and visual recordings in all media featuring live action and animated entertainment for children and motion picture films; sunglasses INT. CL. 14 Jewelry and watches INT. CL. 16 Paper and cardboard articles, namely, greeting cards, stickers; books, namely, baby books, a series of fiction books, books featuring stories, games and activities for children, children's activity books, coloring books, comic books; photograph albums; stationery; office supplies, namely, and school supplies, namely, notebooks INT. CL. 18 Articles made from leather and imitations of leather, namely, wallets; bags, namely,






Mark	Reg. No. Reg. Date	Goods & Services
		backpacks, beach bags, book bags, duffel bags; tote bags; purses; handbags; and diaper bags INT. CL. 25 Clothing, namely, beach cover-ups, beachwear, dresses, jackets, jerseys, pajamas, pants, robes, shirts, skirts, shorts, sleepwear, sweat pants, sweat shirts, swimsuits, tank tops, T-shirts, vests, wrist bands; footwear; and headwear
MICKEY MOUSE	Reg. No. 3750188 Reg. Date Feb. 16, 2010	INT. CL. 9 Audio and visual recordings featuring live action and animated television shows; downloadable video game programs featuring music, stories, games, and activities for children INT. CL. 16 Paper and cardboard articles, namely, paper party favors, printed invitations, office supplies, namely, ball point pens, envelopes, staplers; school supplies, namely, color pencils, erasers, note paper, pen or pencil holders, pencils, pencil sharpeners, pen and pencil cases, pens, writing paper, writing implements INT. CL. 18 Articles made from leather and imitations of leather, namely, luggage tags; bags, namely, overnight bags; shopping bags of textile;



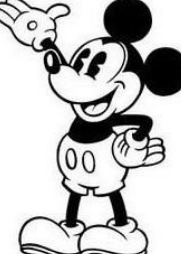
Mark	Reg. No. Reg. Date	Goods & Services
		umbrellas INT. CL. 25 Clothing, namely, cloth bibs for babies, infantwear, jeans, mittens, overalls, rainwear, slippers, socks, and underwear
MICKEY MOUSE	Reg. No. 3007745 Reg. Date Oct. 18, 2005	INT. CL. 14 Jewelry, watches
MICKEY MOUSE	Reg. No. 1152389 Reg. Date Apr. 28, 1981	INT. CL. 16 Story books, children's activity books
MICKEY MOUSE	Reg. No. 3002503 Reg. Date Sept. 27, 2005	INT. CL. 18 Articles made from leather and imitations of leather, namely, book bags; tote bags; handbags; and purses
MICKEY MOUSE	Reg. No. 3584466 Reg. Date Mar. 3, 2009	INT. CL. 20 Picture frames; pillows; and furniture INT. CL. 21 Figurines made of crystal or porcelain; mugs; dinnerware; beverage glassware; beverage ware; and cookie jars INT. CL. 24 Bath towels; bed blankets; bed sheets; bed spreads; comforters; curtains; hand towels; hooded towels; kitchen towels; pillow cases; quilts; towels; washcloths; bed linen; bath linen; household linen
MICKEY MOUSE	Reg. No. 3011935 Reg. Date Nov. 1, 2005	INT. CL. 25 Bathing suits; dresses; gloves; hats; caps; jackets; pajamas; pants; shirts; shoes; shorts; T-shirts; skirts; athletic shoes; boots and sandals

Mark	Reg. No. Reg. Date	Goods & Services
MICKEY MOUSE	Reg. No. 3308015 Reg. Date Oct. 9, 2007	INT. CL. 41 Presentation of motion picture films, namely, in motion picture theaters and providing information via the Internet in the fields of games, music, activities and movies for children
MICKEY MOUSE	Reg. No. 3036883 Reg. Date Dec. 27, 2005	INT. CL. 41 Amusement park and theme park services; entertainment services in the nature of a live amusement park show and performances by costumed characters
	Reg. No. 247156 Reg. Date Sept. 18, 1928	INT. CL. 9 Motion pictures reproduced in copies for sale
	Reg. No. 5670367 Reg. Date Feb. 5, 2019	INT. CL. 14 Jewelry; watches
	Reg. No. 7242630 Reg. Date Dec. 12, 2023	INT. CL. 14 Wall clocks
	Reg. No. 7242632 Reg. Date Dec. 12, 2023	INT. CL. 18 Backpacks; purses; wristlet bags; hand bags; pet clothing

Mark	Reg. No. Reg. Date	Goods & Services
	Reg. No. 7242633 Reg. Date Dec. 12, 2023	INT. CL. 25 Slippers; sweatshirts; sweatpants; shirts; pants; infant body suits; hats; scarves; socks; robes
	Reg. No. 7191292 Reg. Date Oct. 10, 2023	INT. CL. 3 Non-medicated toiletry preparations
	Reg. No. 7191291 Reg. Date Oct. 10, 2023	INT. CL. 14 Clocks
	Reg. No. 7508983 Reg. Date Sept. 17, 2024	INT. CL. 18 Handbags; purses
	Reg. No. 7184910 Reg. Date Oct. 3, 2023	INT. CL. 18 All-purpose carrying bags; backpacks; book bags; fanny packs; knapsacks; waist packs

Mark	Reg. No. Reg. Date	Goods & Services
	Reg. No. 7184911 Reg. Date Oct. 3, 2023	INT. CL. 24 Bath linen; bed blankets; throws; curtains
	Reg. No. 7508982 Reg. Date Sept. 17, 2024	INT. CL. 25 Clothing, namely, jackets; footwear; headwear
	Reg. No. 7184909 Reg. Date Oct. 3, 2023	INT. CL. 25 Clothing, namely, bottoms, dresses, loungewear, pants, shirts, shorts, sweaters, sweatshirts, tops, underwear
	Reg. No. 7184917 Reg. Date Oct. 3, 2023	INT. CL. 3 Non-medicated toiletry preparations
	Reg. No. 7184916 Reg. Date Oct. 3, 2023	INT. CL. 14 Clocks

Mark	Reg. No. Reg. Date	Goods & Services
	Reg. No. 7732717 Reg. Date Mar. 18, 2025	INT. CL. 18 Handbags; purses
	Reg. No. 7184915 Reg. Date Oct. 3, 2023	INT. CL. 18 All-purpose carrying bags; backpacks; book bags; fanny packs; knapsacks; waist packs
	Reg. No. 7184913 Reg. Date Oct. 3, 2023	INT. CL. 24 Bath linen; bed blankets; curtains; throws
	Reg. No. 7508984 Reg. Date Sept. 17, 2024	INT. CL. 25 Clothing, namely, shorts; headwear
	Reg. No. 7191293 Reg. Date Oct. 10, 2023	INT. CL. 25 Clothing, namely, bottoms, dresses, loungewear, pants, shirts, sweaters, sweatshirts, tops

Mark	Reg. No. Reg. Date	Goods & Services
	Reg. No. 3580904 Reg. Date Feb. 24, 2009	INT. CL. 18 Book bags; tote bags; backpacks
	Reg. No. 3580903 Reg. Date Feb. 24, 2009	INT. CL. 25 Shirts; T-shirts; jerseys; footwear
	Reg. No. 7213323 Reg. Date Nov. 7, 2023	INT. CL. 25 Socks; underwear; t-shirts; shorts; pajamas; shoes; sandals; shirts; pants